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United States Government

Department of

Rocky Flats

DUE
DATE 11-1-90

Memorandum



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ACTION *Evered*

DIST.

ALL-OFF. PM.

BRANCH. D.E.

BREEN J.H.

BRETZKE J.C.

BURLINGAME, A.H.

CROUCHER, D.W.

DAVIS J.G.

EVERED, J.E.

FERRERA, D.W.

FERRIS, L.R.

FRANCIS, G.E.

GOODWIN, F.

HEAL, T.J.

JENS, J.P.

KERSH, J.M.

KIRBY, W.A.

MAJESTIC, J.R.

MELLEN, J.E.

MORGAN, R.V.

PARNELL, R.F.

POTTER, G.L.

RHOADES, J.L.

SAFFELL, B.F.

SANFORD, T.H.

SHANNON, W.M.

VAN LEUVEN, D.E.

WARNER, B.P.

YOUNG, E.R.

BACCH, P.E.

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RE:

TO:

OF:

CT:

TO:

OCT 11 1990

WMED-JR:9207

Sampling and Containing Runoff from Pads Where Resource Conservation and Recovery Act Regulated Waste is Stored

J. M. Kersh, Associate General Manager
Environmental Restoration & Waste Management
EG&G Rocky Flats, Inc.

Recently, we have become concerned with the storage of Resource Conservation and Recovery Act (RCRA) regulated wastes at the 750 and 904 pads. Specifically, we are concerned that runoff from these pads is managed in such a way that Rocky Flats Plant does not violate RCRA or the Clean Water Act (CWA). We also wish to assure that runoff from the aforementioned pads will not result in exceedances of limits set by the Colorado Water Quality Control Commission in surface waters downstream of the Plant.

As regards RCRA, we wish to assure that runoff from the pads is not of itself classifiable as hazardous waste. My staff has discussed this matter with Mr. Fred Dowsett of the Colorado Department of Health. It was Mr. Dowsett's belief that, if spills of hazardous waste had occurred on the pads, documentation of adequate cleanup would be sufficient to assure that subsequent runoff would not be classified as hazardous waste. Mr. Dowsett was informed of our current practice of performing radiological surveys to assure spill cleanup. While he believed that this may be an effective means of determining whether or not spills had been cleaned up, he also expressed the desire to compare this type of screening with actual analyses for hazardous materials, such as heavy metals, and other potential screening parameters, such as nitrates.

With regard to potential CWA compliance concerns that may be associated with runoff from these pads, we need to assure that runoff is being adequately characterized with respect to its possible contaminant load. The terms of our National Pollutant Discharge Elimination System (NPDES) permit obligate us to report the discharge of new types of pollutants in those cases of facility expansion or the institution of new processes on Plant site. While we do not believe that pad runoff constitutes the type of discharge change anticipated by the language of our NPDES permit, we do believe that a full characterization of our pad runoff (at least with respect to those contaminants most likely to occur in the runoff) is both prudent in terms of optimum protection of downstream waters and timely in terms of the impending renewal of our NPDES permit. We have spoken with Mr. Bob Shankland of the U.S. Environmental Protection Agency in this regard, and he recommended institution of easily monitored screening parameters to determine whether or not water that accumulates on the pads is suitable for discharge. He also believed that characterization of pad runoff with regard to heavy metal content would provide worthwhile information to support our upcoming NPDES permit renewal. Such a characterization would also provide information on the potential for pad runoff to cause exceedances of downstream water quality standards.

Reviewed for Addressee
Corres. Control RFP

10-12-90

DATE

B

Ref Ltr. #

ADMIN RECCRD

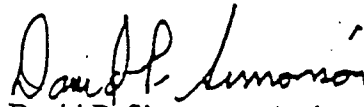
OCT - 1 1990

We therefore request that you provide us with the following:

1. A description of current practices used to assure that spills of hazardous wastes on the 750 and 904 pads are adequately cleaned up. If this procedure does not already include sampling for heavy metals and nitrates, please propose alterations to the current procedure that address this. We also request that you provide any data that might already exist regarding comparisons of radioactivity levels, heavy metals concentrations, and nitrate levels resulting from spills of hazardous wastes on the pads in question.
2. Since we understand that you currently attempt to contain and sample water that accumulates in these areas, we ask that you provide a description of current practices to contain and treat runoff that accumulates on the 750 and 904 pads. We also ask that you describe for us the current sampling practices for this water and the criteria used for determining whether or not this water is suitable for discharge. We request that you provide us with any recent data you may have regarding the quality of this water. *Justification* ~~If current practices do not include sampling and analysis of this water for heavy metals, please propose a sampling program to gather data for heavy metals content of pad runoff water to support our NPDES permit renewal. If plans are underway to improve our capability to retain and/or treat pad runoff, please describe these plans and their rationale. We concur with efforts to sample, analyze, and contain runoff from these pads as necessary, and wish to assure that we are making every reasonable effort to do so.~~ *Future plans*

We ask that you provide this information to us by November 1, 1990; we have conferred with your staff in this regard.

If there are any questions, please feel free to contact me or have your staff contact Tom Lukow of my staff on extension 4561.



David P. Simonson, Acting Assistant Manager
for Environmental Management

cc:
J. Rampe, DOE
J. Kieffer, DOE
M. Van Der Puy, DOE
G. Fess, DOE

ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT
DOCUMENT DESCRIPTION TRAVELER

DUE DATE:

Nov 1, 1990

APPROVED BY:

MANAGER:

DIRECTOR:

PREPARER:

Bob James

PHONE #

5006

DOCUMENT SUBJECT:

spills AND Runoff control AND ANALYSIS
from Pads 750 and 904

BACKGROUND

(Information that will explain why we are sending this document)

THIS MEMO IS IN RESPONSE TO DOE dated 10/11/90 ATTACHED.
DOE'S CONCERN SEEMS TO BE THE SAME AS THE
GRAND JURY'S - POTENTIAL RCRA AND CWA VIOLATIONS
ROCKY FLATS HAS BEEN AWARE OF POTENTIAL PROBLEMS W/
RCRA WASTE OUTSIDE SINCE 1989.

DISCUSSION/ISSUES:

(Highlight any issues that signee should be made aware)

DOE - IS REQUESTING WE INCREASE THE NUMBER
OF PARAMETERS SAMPLED FOR AT PADS 750 AND 904
IF NEW PARAMETERS ARE USED AS CLEANUP CRITERIA
IT WILL HINDERED CLEANUP. THEY COULD BE USED FOR
VERIFICATION

ALTERNATIVES/IMPACTS:

(Alternative actions & impacts considered, if appropriate)

RECOMMENDATION:

(If different from or as follow-up to this document, if appropriate)

CONCURRENCES OBTAINED:

(Other groups in/outside EG&G-RF who have concurred on this document)

Legal - REVIEWED & COMMENTED

Pondcrete Operations - John Guardanoli, Bob Morgan REVIEWED & COMMENTED

Permitting & Compliance - REVIEWED & declined to SPECIFY
OBJECTIONS.